

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS; RAJ LEE;  
MICHAEL CAMERON; MATTHEW SAUNDERS,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity as  
Sheriff of Oakland County; CURTIS D. CHILDS, in his  
official capacity as Commander of Corrective Services;  
OAKLAND COUNTY, MICHIGAN,

Defendants.

Case No.: 20-cv-10949-LVP

Hon.: Linda V. Parker

**DECLARATION OF DEAN SULLIVAN**

I, Dean Sullivan, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently housed in the Oakland County Jail ("Jail") on the second floor of the main jail building. I am in cell A1C. I have been here awaiting trial since January 7, 2020. My trial is currently scheduled for May 5, 2020, but I do not know whether it will actually occur on that date.

2. I suffer from asthma and a number of serious injuries related to me falling off of a house in 2009. I broke three ribs and a pelvic bone, and I have a closed head injury. I have chronic pain as a result. Before I was incarcerated, I was working with a pain management clinic. I was doing physical therapy, and was prescribed a number of medications for my conditions, including Percocet, amitriptyline, lyrica, and Lipitor. It took two months for me to get amitriptyline from the jail, and they still will not give me Percocet.

3. Before the lawsuit was filed, I had no response to several requests for medical attention. I've sent in a lot of kites requesting not only the doctors, but the psych doctors, and I've had almost no response. On a rare occasion before the pandemic when there finally was a response, they charged me \$12 just to bring me down and talk to me, take my blood pressure, and send me back to my cell without doing anything. As a result, I am now afraid to ask for medical attention unless it is very serious. I have never had any response to any kites requesting psychological care. Since the lawsuit was filed, I have observed that medical kites actually receive responses more often. I believe this lawsuit may have saved lives as a result.

4. Because of the injuries from my accident, I have severe back and shoulder pain and very bad arthritis. The mats that we get to sleep on are about two and a half inches thick. It is extremely painful for me to lie down on them because of my back and shoulders. When I sit on my bunk, I'm maybe ten inches off of the ground, which hurts my back because I have to bend over. I requested medical attention for my back and shoulder pain about a month and a half ago. The doctor who came to see me said, "I can't give you what you take out in the world for pain. You shouldn't have gotten locked up." That doctor then sent me back to my cell without treatment.

5. A couple of days ago, a guy in my cell had a seizure. We saw him hit his head and begin seizing. When the nurse came, she said something about his blood pressure medication and said that he did not have a seizure. She dismissed what happened to him.

6. It is not possible to practice social distancing of any kind. On May 1, 2020, a sign was posted saying that all inmates must sleep head to toe, but that won't help anything because we're still all breathing the same air and the bunks are so close together. Our cells are three walls and then a set of bars in the front. The air is recirculated, so we are all breathing in the same air.

7. Only two weeks ago, the jail put up a statement telling us to wash our hands in response to the COVID-19 pandemic.

8. We are served peanut butter and jelly sandwiches three times a day. Sometimes we get a 4 ounce container of apple juice or travel bowl of cereal with powdered milk that we have to make ourselves. We don't get any hot meals at all. We often are uncomfortable and bound up because of the diet.

9. We receive three hotel-sized bars of soap and one roll of toilet paper once a week. Some of us pool our soap together so that we don't run out, but that still concerns me because it's bar soap, and so it is not the safest for fighting Coronavirus. But otherwise, we would not have enough to wash our underwear and socks, shower, and wash our hands.

10. On May 1, 2020, we were told that we could start purchasing from the commissary starting next week, but the orders would be put together by Aramark workers and sent over by a trustee. We were told to "order at [our] own risk," because if a trustee takes something out of one of our orders, we do not get a refund for that item.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

May 3, 2020

/s/ Dean Sullivan

Dean Sullivan

\*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On May 3, 2020, I personally spoke with Dean Sullivan and read this declaration to him. Dean Sullivan told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/ Syeda F. Davidson

Syeda F. Davidson